

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
Jared K. Fitzgerald	:	Chapter 13
Jacqueline J. Fitzgerald	:	Case No.: 20-13369 ELF
Debtor(s)	:	

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**MOTION FOR AUTHORITY TO SELL REAL PROPERTY**

Debtors, Jared K. Fitzgerald and Jacquelyn J. Fitzgerald, by and through her undersigned counsel bring this Motion to Sell Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code; and in support thereof aver the following:

1. Debtors commenced the instant Chapter 13 matter on August 17, 2020 by filing a Voluntary Petition.
2. The Chapter 13 Plan was confirmed on March 16, 2021.
3. The subject real property is located at 3711 Green Ridge Road, Furlong, Pennsylvania (hereinafter referred to as “the property”) and is owned by the Debtors.
4. The Debtors believes it to be in their best financial interest to sell the property.
5. In furtherance of the sale, Debtors hired Frank Dolski of Coldwell Banker Hearthside –Lahaska.
6. On or about April 8, 2022, Debtors, by and through their realtor entered into an Agreement of Sale of the property in the amount of \$997,700. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit “A.”**
7. The settlement date for the sale of the subject property is scheduled for June 15, 2022.

8. The Buyer, Ravshan Samatov, is not and insider of the Debtors and the sale represents an arms-length transaction between the parties made without fraud and/or collusion.

9. From the sale proceeds the Debtors intend to satisfy the mortgage held by Rushmore Loan Management Services, along with any other liens on the property.

10. The Debtors are desirous of receiving their full exemption in the sum of up to \$50,300.00 plus the remaining proceeds after all claims are satisfied.

**WHEREFORE**, Debtors, respectfully request that the Court enter an Order: (i) Granting this Motion, (ii) Authorizing the Debtors to sell the Property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate, and (iii) Granting the Debtors such other and further relief to which they may be justly entitled.

Dated: April 19, 2022

/s/Brad J. Sadek, Esq  
Brad J. Sadek, Esq.  
Attorney for Debtors  
Sadek and Cooper, LLC.  
1315 Walnut Street, #502  
Philadelphia, PA 19107  
215-545-0008